

# Law Offices of Colin Mulholland

Employment and Civil Litigation

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August 15, 2025

**VIA ECF**

Honorable Valerie Figueredo  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Sanchez et al v. Park Ave. Apartments LLC et al, 23-cv-7081

Your Honor:

Counsel have a draft agreement and a draft Rule 68 out for client approval. We are simply addressing some of the litigants concerns about their options under the Cheeks regime. Counsel for both sides are very eager to submit a final resolution for the Court.

If the Court would so indulge, counsel would jointly request for leave to submit their Rule 68 or settlement agreement on or before August 22, 2025.

The parties greatly appreciate the Court's patience with this matter.

Respectfully Submitted,

/s/ Colin Mulholland, Esq.

**MEMO ENDORSED**

  
**HON. VALERIE FIGUEREDO**  
**UNITED STATES MAGISTRATE JUDGE**

Dated: 8/19/25

The extension requested herein is GRANTED. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 50.